



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105

May 15, 2013

Delivered via email to: DFeiglStok@Chevron.com  
CHEVRON RICHMOND REFINERY  
In Reply Refer to:  
Chevron Richmond Refinery, Richmond, CA

Nigel Hearne, Manager  
Chevron Richmond Refinery  
841 Chevron Way  
Richmond, CA 94801

RE: Request for Information  
Chevron Richmond Refinery

Dear Mr. Hearne:

The United States Environmental Protection Agency ("EPA") Region IX is continuing our investigation of the Chevron Richmond Refinery (the "Facility"), located at 841 Chevron Way, Richmond California 94801, which is owned and operated by Chevron Corporation (the "Company"). The request for information enclosed with this letter ("Information Request") identifies information and documents relating to the Company's compliance with Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act ("CERCLA"), 42 U.S.C. § 9603; Sections 302 through 312 of the Emergency Planning and Community Right-to-Know Act ("EPCRA"), 42 U.S.C. §§ 11002 – 11022; and Section 112(r) of the Clean Air Act ("CAA"), 42 U.S.C. § 7412(r).

This Information Request is authorized pursuant to the following federal environmental statutes:

- CERCLA, as amended, 42 U.S.C. § 9604;
- EPCRA, 42 U.S.C. § 11001 *et seq.*; and
- CAA, as amended, 42 U.S.C. § 7414.

Please provide the requested information and documents within 14 calendar days of the date of this letter. **Ensure that each document provided in response to this information request indicates the EPA question number (see enclosed "Instructions" and "Information Request").** Electronic copies are preferable. EPA believes that much of the requested information is, or should be, readily available at the Facility.

Please note that the Company's compliance with this Information Request is mandatory. Failure to respond fully and truthfully may result in enforcement action by EPA pursuant to Section 104(e)(5) of CERCLA, 42 U.S.C. § 9604(e)(5), or Section 113(a)(3) of the Clean Air Act, 42 U.S.C. § 413(a)(3). These statutory provisions authorize EPA to seek penalties up to \$37,500 for each day of noncompliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

If you have questions about the legal aspects of this Information Request, please contact Joshua Wirtschafter, Assistant Regional Counsel, U.S. EPA Region IX, at (415) 972-3912. The Region IX technical contact for this information request is Mary Wesling, EPCRA/RMP Compliance Officer. Ms. Wesling can be reached at (415) 972-3080. We thank you in advance for your cooperation.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jane Diamond', with a long horizontal stroke extending to the right.

Jane Diamond, Director  
Superfund Division

Enclosures

Information Request (Instructions, Definitions, Questions)

cc: M.Wesling, U.S. EPA Region IX  
J. Wirtschafter, U.S. EPA Region IX  
M. Farley, Katten, Muchin, Rosenman LLP



## ENCLOSURE

### **INSTRUCTIONS**

1. Please provide a separate response to each request. For each document produced, identify the request to which it is responsive. For electronic copies provided to EPA, also identify the Chevron Bates Numbers.
2. Knowledge or information that has not been memorialized in any document, but is nonetheless responsive to a request, must be provided in a narrative form.
3. The scope of this Information Request includes all information and documents obtained or independently developed by the Company, its attorneys, consultants or any of their agents, consultants, or employees.
4. The Company may not withhold any information from EPA on the grounds that it is confidential business information. EPA has promulgated regulations, under 40 CFR Part 2, Subpart B, to protect confidential business information that it receives. The Company may assert a business confidentiality claim (in the manner specified in 40 CFR § 2.203(b)) for all or part of the information requested by EPA. However, business information is entitled to confidential treatment only if it satisfies the criteria set forth in 40 CFR § 2.208. EPA will disclose business information entitled to confidential treatment only as authorized by 40 CFR Part 2, Subpart B. If no claim of confidentiality accompanies the information at the time EPA receives it, EPA may make it available to the public without further notice.
5. Notice is hereby given, pursuant to 40 CFR §§ 2.301(h) and 2.310(h), that EPA may disclose confidential information provided by the Company to EPA's authorized representatives, including its contractors, Energy and Environment, Inc. ("E and E"). Confidential information may be disclosed to EPA's authorized representatives for the following reasons: to assist with document handling, inventory and indexing; to assist with document review and analysis for verification of completeness; and to provide expert technical review of the contents of the response. Pursuant to 40 CFR §§ 2.301(h) and 2.310(h), the Company may submit, along with its response to this Information Request, any comments regarding EPA's disclosure of confidential information to its authorized representatives.
6. If information or documents not known or available to the Company at the time of its response to this Information Request later become known or available to it, it must supplement its response to EPA. Moreover, should the Company find at any time after the submission of its response that any portion of the submitted information is false or misrepresents the truth, the Company must notify EPA as soon as possible and provide EPA with a corrected response.
7. If information responsive to a request is not in the Company's possession, custody, or control, identify the persons or entities from whom such information may be obtained. For each individual or entity that possesses responsive information, please provide the following: name, last known or current address, telephone number, and affiliation with the Company or the Facility.
8. If you believe there are grounds for withholding information or documents that are responsive to this request, e.g., attorney-client privilege, you must identify the information or documents and state the basis for withholding.

## DEFINITIONS

The following definitions apply to the following terms (words or phrases) as they appear in this Information Request. Defined terms are enclosed in quotation marks:

1. "You" or the "Company" shall mean Chevron Corporation, or its officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.
2. "Facility" means all buildings, equipment, structures, installations, pipes, or stationary items owned, leased, or operated by Chevron Corporation, at the Chevron Richmond Refinery property or properties located at 841 Chevron Way, Richmond, California, or contiguous or adjacent to that address.
3. "Document" or "documents" shall mean any printing, typing, writing, photostat, or any other copy, microfilm, film record, video record, CD, sound recording, tape, disc, or other type of memory associated with computers, including any instructions necessary to read such material, and any other tangible item recording information.
4. "Chemical" shall mean any extremely hazardous substance listed in Appendices A and B of 40 CFR Part 355; any hazardous substance, as defined in Section 101(14) of CERCLA, including any mixtures of hazardous substances with any other substances, such as petroleum products; and any pollutant or contaminant, as defined in Section 101(33) of CERCLA, including any mixtures of pollutants or contaminants with any substances, such as petroleum products;, and any regulated substance listed pursuant to section 112(r)(3) of the Clean Air Act as amended, in 40 CFR § 68.130.
5. "Release" shall have the same definition as that contained in Section 101(22) of CERCLA, and shall include any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substances or pollutants or contaminants.
6. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the CAA, CERCLA, EPCRA, 40 CFR Part 68, 40 CFR Part 300, or 40 CFR Part 355, in which case the statutory or regulatory definitions shall apply.



## INFORMATION REQUEST

### REQUESTS REGARDING THE CLEAN AIR ACT SECTION 112(r) RISK MANAGEMENT PROGRAM AND GENERAL DUTY CLAUSE

1. Clean Air Act Section 112(r)(7), 40 CFR 68.15, Management
  - a. **Provide a copy of the Company's "RiskMan2" procedure for the Facility.**
2. Clean Air Act Section 112(r)(7), 40 CFR Subpart D, Prevention Program
  - a. Mechanical Integrity (40 CFR Part 68.73)
    - i. **Provide a copy of the "Chevron ETC Fitness for Service Policy," referenced in "Richmond Refinery Piping Inspection Guideline," [Rev. 2 – 7/14/2010], Section 8.4, (Bates number CUSA-EPA-0000117).**
    - ii. **Provide a copy of "Chevron Fitness for Service Guideline" referenced in "Richmond Refinery Piping Inspection Guideline," [Rev. 2 – 7/14/2010], Appendix 2, Definition.**
    - iii. **During an interview with agencies, John Beauregard stated that he maintained a "Word file on the M drive" with his notes on follow-up of the MAXIMO work order requests which had been denied. Please provide a copy of the referenced Word document located on the M drive which includes references to the #4 sidecut piping.**
    - iv. **Provide a legible copy of "Chevron Integrated Risk Prioritization Matrix for the Assessment of HES & Asset Risks from Event or Activity," previously provided as Bates Number CUSA-CSB-0000796. Previously provided image of this document was blurry and not readable.**
    - v. **Provide the Facility's "1Q/2007 4CU major S/D – DED Post Mortem Attachment 4-5 Piping and Vessel Assessment."**
    - vi. **Provide copies of the Facility's Refined Lubrication Oil Process Unit ("RLOP") Work Order (wo) number 364930 referring to E-1517 line), Management of Change ("MOC") # 24316, MOC # 25396, Inspection Recommendation # 87278 and "EWO#6881," referring to RLOP Plant 15 E1517 line. (See previously provided document Bates number CUSA-EPA-0006391.)**
    - vii. **Provide copies of RLOP Work Order #362833, "EWO #6783", MOC # 25214, referring to RLOP #2 side cut piping upgrade for P-1525 and P-1525A discharge spools, "(85FV181 loop) & (P-1525/A Discharge Spools)." (See previously provided document Bates number CUSA-EPA-0006391.)**
    - viii. **Provide RLOP F-1550 NDE data (UT, RT and PMI) referenced in "History Brief" dated 11/08/2011 (Bates #s CUSA-EPA-0004162-**

0004163), including metallurgical analysis on the 11 tubes and 4 fittings which were replaced.

- ix. Provide most recent NDE inspection data (UT, RT and PMI) for all RLOP furnaces constructed with 5Cr alloy.
- x. Provide detail for “annual internal inspections” conducted on all RLOP furnaces which process/heat hydrocarbons, as referenced by Jessica Stankiewicz during 1/30/2013 meeting with EPA. Include any nondestructive evaluation data.

b. Management of Change (MOC) (40 CFR Part 68.75)

- i. Provide a copy of MOC #15925, and all associated documentation reflecting dates of sign-offs, decision justifications and follow-up tracking, including but not limited to status work referenced in this MOC.
- ii. Provide a complete copy of MOC #24334. Cover page only was provided as Bates # CUSA-EPA-0006393.
- iii. Provide a copy of MOC #24255 (cover page only), date issued 11/22/2011 showing “Date Completed” by all responsible persons. (Copy previously received by EPA as Bates Number CUSA-CSB-0001234 showed “#####” for completion date by Praneil-Maharaj Prasad.)
- iv. Provide a copy of MOC #25789 (cover page only), date issued 11/12/2012, showing “Date Completed” by all responsible persons.

c. Incident Investigation (40 CFR Part 68.81)

- i. Provide Investigation report “MITS-2006-742, dated 5/18/06, titled “Loss of 4 S/C at Crude Unit,” referenced in previously provided document identified by Bates Number CUSA-CSB-0000611.



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

**DELIVERY RECEIPT**

**May 13, 2013**

**CAA Section 114 Request for Information  
Chevron Richmond Refinery**

**DELIVERED VIA EMAIL TO:**

**Dave Fieglstok  
Manager, HES  
CHEVRON RICHMOND REFINERY**

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**Signature**

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**Date**

**Representing Addressee:  
Nigel Hearne, Manager  
Chevron Richmond Refinery  
841 Chevron Way  
Richmond, CA 94801**

**Please provide signed copy to Mary Wesling, US EPA via email, at  
wesling.mary@epa.gov.**